



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 9, 2022

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020, December 17, 2020, February 11, 2021, February 19, 2021, July 9, 2021, July 23, 2021, August 17, 2021, November 3, 2021 and January 27, 2022. The government renews its request for reciprocal discovery from the defendants.

The materials produced today are subject to the protective order entered in this case on May 29, 2020. They consist of electronically stored information (such as emails and attachments) seized pursuant to search warrant from Microsoft Corporation, Rackspace US, Inc. and Aventura's internal corporate email server. These materials are produced under Bates numbers in the following range: AVTESI_0005244127-AVTESI_0005547554.

This material is available at Dupe Coop, where it can be obtained by requesting Production 14.

Please do not hesitate to contact us with any questions or if you wish to discuss a resolution of this matter.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)